

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

JUN 26 2025 12:20 P

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN SULLENS,

Defendant.

CASE NO. *25-cr-00110*

JUDGE *W. J. Walker*

INDICTMENT

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(8)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

**FORFEITURE ALLEGATION**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**(Possession with Intent to Distribute Fentanyl)**

1. On or about July 18, 2024, in the Southern District of Ohio, the defendant, **STEPHEN SULLENS**, did knowingly, intentionally and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).**

**COUNT TWO**  
**(Felon in Possession of a Firearm)**

2. On or about July 18, 2024, in the Southern District of Ohio, the defendant, **STEPHEN SULLENS**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in or affecting interstate commerce, a firearm, specifically, a Smith & Wesson, Model SW40VE, .40 caliber pistol, bearing serial number DVN5972, and ammunition.

**In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).**

**FORFEITURE ALLEGATION**

3. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

4. Upon conviction of any of the offenses alleged in this Indictment, the defendant, **STEPHEN SULLENS**, shall forfeit to the United States all of his right, title, and interest in:

a. the firearm and ammunition involved in or used in any of the offenses alleged in this Indictment, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c); and/or

b. any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any of the violations of 21 U.S.C. § 841 as alleged in this Indictment, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s), in accordance with 21 U.S.C. § 853(a)(1) and (2);

including, but not limited to, the following firearm and ammunition seized on or about July 18, 2024:

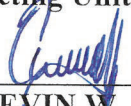
- A Smith & Wesson, Model SW40VE, .40 caliber pistol, bearing serial number DVN5972; and
- All associated ammunition.

Forfeiture notice in accordance with 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853(a)(1)-(2), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

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FOREPERSON

KELLY A. NORRIS  
Acting United States Attorney

  
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KEVIN W. KELLEY (0042406)  
Assistant U.S. Attorney